

March 2, 2007

Ms. Laura E. Sinram
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

RE: CME/PAC, Chicago Mercantile Exchange Inc. PAC
C00076299
FEC Form 3X - October Monthly Report (9/1/06 - 9/30/06)

Dear Ms. Sinram:

I write in response to your letter dated February 2, 2007, concerning the contribution to Steny Hoyer for Congress listed under Schedule B supporting Line 23 of the above referenced report.

On August 24, 2006, a \$2,500 contribution check was prepared as a contribution to Steny Hoyer's campaign in the primary election for Congress. However, the check was not delivered to Congressman Hoyer's campaign until September 13, 2006, and was reported on our October Monthly Report covering the period September 1-30, 2006, as a primary contribution dated September 13, 2006. When that report was filed, we did not realize that the check had been delivered one day after the Maryland primary election on September 12, 2006.

We have contacted the Steny Hoyer for Congress campaign concerning the contribution check dated August 24, 2006, and the inadvertent delivery of the check after the primary election date. Campaign staff stated that they had sent correspondence to us after receipt of the contribution check asking that we redesignate the \$2,500 as a contribution to their general election campaign. We do not recall receiving that correspondence and have not found a copy in our files.

The Steny Hoyer for Congress campaign has agreed to refund to CME/PAC the \$2,500 contribution in question. We have not yet received the refund, but when we do, we shall report it as A Refund of Contributions Made to Federal Candidates and Other Political Committees on Line 16 of the FEC report.

This error was completely inadvertent. We had no intention to make an impermissible contribution, and we would have redesignated the contribution for the general election campaign if we had received a timely request from the campaign to do so.

Sincerely,
Ronald A. Pankau
Secretary-Treasurer
CME/PAC
